



United States  
Department of  
Agriculture

Forest  
Service

Malheur  
National  
Forest

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File Code: 1950

Date: May 19, 2003

Dan Tippy  
Acting Field Manager  
Central Oregon Resource Area  
3050 N.E. 3rd Street  
Prineville, OR 97754

RECEIVED  
MAY 22 2003  
BLM PRINEVILLE  
DISTRICT

Dear Mr. Tippy:

At the request of Christina Welch, from your staff, my staff has reviewed the *Environmental Assessment and Finding of No Significant Impacts for the Little Canyon Mountain Fuel Reduction Project*, EA#OR-054-02-083, and its supporting documents. These are our comments.

The document describes the area as largely populated by dry ponderosa pine stands, with Douglas fir present in many areas. In looking at the area, there are at least two distinct types of stands on the mountain. The dry ponderosa pine stands do exist on the southerly and west aspects, however, on the east and northerly aspects, the stands change to moister types. This is quite visible by the increase in Douglas fir and the change in the ground vegetation components (composition).

From a silvicultural point of view, an alternative (such as Alternative F), that takes into consideration the capability of the site for each stand, is best. The alternatives using a broad-scale, single prescription approach will encourage regeneration of understory vegetation, as the understory is opened to sunlight, nutrients, and moisture. The current trees in many of these stands have already "self-pruned" and do not pose a problem for ladder fuels. After treatment of this area by your alternatives, future regeneration, if not periodically treated, will pose a problem as crowns grow into ladders to the residual trees.

From a hazardous reduction focus, we recognize Alternative E provides the greatest effects to reduction of catastrophic fire throughout the planning area. It improves the greatest amount of road access and does not eliminate any existing road access, an important feature in effective fire suppression and access for future fuels management activities. This alternative also sets the stage to reduce the impacts of wildland fire within the proclaimed Strawberry Mountain Wilderness, when spreading towards the boundary. Any treatments in, or adjacent to Byrum Gulch, Canyon City's municipal watershed, would provide substantial benefits. Alternative D provides the next best reduction of hazardous fuels.

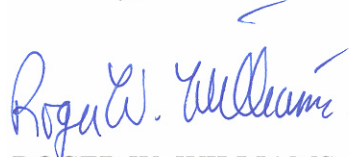
We encourage you to select an alternative you believe best balances the resources involved with increased fire protection for the communities of Canyon City and John Day. We recognize



implementing fuels reduction treatments as a preventative measure, are better than dealing with the results of a catastrophic wildfire occurring in this urban interface area.

If you have any questions concerning these comments, please contact our Fire Staff, Jeff Pendleton or our Forest Silviculturist, Bill McArthur at 541-575-3000.

Sincerely,

A handwritten signature in blue ink that reads "Roger W. Williams". The signature is fluid and cursive, with a small flourish at the end.

ROGER W. WILLIAMS  
Forest Supervisor